



Stop Animal Exploitation NOW!

Dr. Elizabeth Goldentyer  
USDA/APHIS/AC  
920 Main Campus Drive, Suite 2000  
Raleigh, NC 27606

1/14/19

Dr. Goldentyer,

I am writing to you today to file an Official Complaint against Morehouse School Of Medicine (57-R-0124) relevant to serious violations of the Animal Welfare Act.

As you know, Morehouse School Of Medicine (MSM) was inspected on 12-DEC-2018. This heinous laboratory was cited for a CRITICAL violation of Sec. 2.32 Personnel Qualifications:

***"2.32(a) CRITICAL PERSONNEL QUALIFICATIONS.***

***Two hamsters were severely injured during a social defeat model session conducted by a student researcher on/about 6/21/18. One of the hamsters (18-12) was reported as not looking good on 6/21/18 via an email from the student and was found deceased 10 minutes later by veterinary staff. The second hamster was found by veterinary staff to have multiple fight wounds on its back, neck and haunches and was noted to be extremely lethargic and grinding its teeth on 6/22/18. It was treated by veterinary staff on 6/22/18 and was found deceased on 6/23/18. Review by facility and IACUC members included interviews with the student and the principal investigator. It was determined that the student researcher was insufficiently trained. The student left the hamsters in the same cage for the full five minutes of the defeat session as described in the protocol and did not separate them sooner based on the aggressive actions exhibited by the hamsters as delineated in the protocol."***

In other words, due to MSM staff failure to follow the protocol, based on their inexperience and lack of training, they allowed animals to attack one another until two of them were so severely injured as to die despite veterinary treatment.

The fact that these MSM staff were not adequately trained clearly also violates ***Sec. 2.31 Institutional Animal Care and Use Committee (IACUC). (d) IACUC review of activities involving animals. (viii) Personnel conducting procedures on the species being maintained or studied will be appropriately qualified and trained in those procedures;***

However, another issues is potentially equally disturbing. The inspection report goes on to say:

***"The IACUC July 19, 2018 minutes state that the incidence was reported to the USDA but further investigation determined that the statement was an error-the IACUC chair communicated that no report was made."***

The final impact of this reporting failure is that this facility withheld information from federal regulators. In other words, this failure to comply with federal regulations was hidden from the USDA, constituting a cover-up. However, this is NOT the first time that this project was not fully & accurately reported to the USDA.

As you know Animal Welfare Act regulations state:

***"Sec. 2.36 Annual report. (b) The annual report shall: (7) State the common names and the numbers of animals upon which teaching, experiments, research, surgery, or tests were conducted involving accompanying pain or distress to the animals and for which the use of appropriate anesthetic, analgesic, or tranquilizing drugs would have adversely affected the procedures, results, or interpretation of the teaching, research, experiments, surgery, or tests. An explanation of the procedures producing pain or distress in these animals and the reasons such drugs were not used shall be attached to the annual report;"***

The project associated with this recent violation of Sec. 2.32 has, according to publications been underway for a number of years (*Immediate post-defeat infusions of the noradrenergic receptor antagonist propranolol impair the consolidation of conditioned defeat in male Syrian hamsters* Physiol Behav. 2015 Dec 1; 152(0 0): 56–61.) So, based on the publication date of this article, it is clear that this project dates at least back to 2015. Therefore, the annual reports filed by Morehouse School Of Medicine for approximately the period 2015 - 2018 should include animals used in this project.

Now, it is clear that these animals are being seriously injured, and at least at the time of injury, they are not anesthetized, because if they were anesthetized, they would not become psychologically conditioned to defeat. Therefore, these animals are experiencing unrelieved pain, and should have been reported appropriately in Column E on the annual reports of Morehouse School Of Medicine, as having experienced unrelieved pain. However, according to the Annual Reports available on the USDA website, no hamsters are reported in Column E for either 2017 or 2016. Therefore, the Morehouse School Of Medicine has also violated Sec. 2.36 Annual report. (b) (7) of the Animal Welfare Act, as quoted above, at least twice.

I can only assume that their motivation for failure to classify this experiment as Column E involves the additional reporting requirements for experiments involving unrelieved pain, which would essentially make the heinous nature of this project internet accessible to anyone who is aware of the USDA website. This behavior, when combined with the failure to report the violations cited in the 12-DEC-2018 inspection as is required by the USDA, constitutes a cover-up.

I hereby file an Official Complaint against Morehouse School Of Medicine (57-R-0124) relevant to serious violations of the Animal Welfare Act, including Sec. 2.32 Personnel Qualifications and Sec. 2.36 Annual Report.

I know that your office takes major violations of the Animal Welfare Act to be very serious in nature, especially when the violations cause serious distress and/or death to animals. I must insist that you take the most severe action allowable under the Animal Welfare Act and begin the process of issuing the maximum allowable fine of \$10,000 per infraction/per animal against Morehouse School Of Medicine (57-R-0124) at the completion of your investigation.

I look forward to hearing from you in the near future about the fate of this facility.

Sincerely,

*Michael A. Budkie, A.H.T.*

Michael A. Budkie, A.H.T.,  
Executive Director, SAEN

Attachments: USDA Inspection Report & Annual Reports relevant to Morehouse School Of Medicine.



## Inspection Report

Morehouse School Of Medicine  
720 Westview Drive Sw  
Atlanta, GA 30310

Customer ID: 883

Certificate: 57-R-0124

Site: 001

MOREHOUSE SCHOOL OF MEDICINE

Type: ROUTINE INSPECTION

Date: 12-DEC-2018

### 2.32(a) CRITICAL

#### PERSONNEL QUALIFICATIONS.

Two hamsters were severely injured during a social defeat model session conducted by a student researcher on/about 6/21/18. One of the hamsters (18-12) was reported as not looking good on 6/21/18 via an email from the student and was found deceased 10 minutes later by veterinary staff. The second hamster was found by veterinary staff to have multiple fight wounds on its back, neck and haunches and was noted to be extremely lethargic and grinding its teeth on 6/22/18. It was treated by veterinary staff on 6/22/18 and was found deceased on 6/23/18. Review by facility and IACUC members included interviews with the student and the principal investigator. It was determined that the student researcher was insufficiently trained. The student left the hamsters in the same cage for the full five minutes of the defeat session as described in the protocol and did not separate them sooner based on the aggressive actions exhibited by the hamsters as delineated in the protocol. In addition the student was not keeping adequate procedural records and was not adequately trained in identifying and reporting hamster health issues to include wounding. A retraining action plan was implemented by the PI for all lab student researchers. The IACUC July 19, 2018 minutes state that the incidence was reported to the USDA but further investigation determined that the statement was an error-the IACUC chair communicated that no report was made. Since the retraining was conducted, no further hamster wounding issues have been reported. Continue to ensure that all researchers using animals on this protocol are trained in the proper handling and proper post-procedural care of the hamsters.

This inspection and exit interview were conducted with undersigned Director of Operations.

Prepared By:

**BRUNKHORST SUSANNE, D V M**

BRUNKHORST SUSANNE, D V M USDA, APHIS, Animal Care

Title: VETERINARY MEDICAL OFFICER 1076

Date:

12-DEC-2018

Received By:

Title:

Date:

12-DEC-2018

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.		<b>OMB APPROVED</b> 0579-0036 Exp.: 10/31/2018
This report is required by law (7 U.S.C. 2143). Failure to report according to the regulations can result in an order to cease and desist and to be subject to penalties as provided for in Section 2150.		Interagency Report Control No. 0180-DOA-AN
		Fiscal Year 2017

<b>UNITED STATES DEPARTMENT OF AGRICULTURE</b> <b>ANIMAL AND PLANT HEALTH INSPECTION SERVICE</b>  <b>ANNUAL REPORT OF RESEARCH FACILITY</b> (TYPE OR PRINT)	<b>1. REGISTRATION NUMBER</b> 57-R-0124
	<b>2. HEADQUARTERS RESEARCH FACILITY</b> (Name, address, and telephone number as registered with USDA, include ZIP Code)  MOREHOUSE SCHOOL OF MEDICINE 720 WESTVIEW DRIVE SW  ATLANTA, GA 30310

<b>3. REPORTING FACILITY</b> (List all locations where animals were housed or used in actual research, testing, teaching, or experimentation, or held for these purposes. Attach additional sheets, if necessary.)
--

<b>FACILITY LOCATIONS (Sites)</b>  <div style="background-color: black; height: 40px;"></div>
---

**REPORT OF ANIMALS USED BY OR UNDER CONTROL OF RESEARCH FACILITY** (Attach additional sheets, if necessary, or use APHIS FORM 7023A.)

A.  Animals Covered By The Animal Welfare Regulations	B.  Number of animals being bred, conditioned, or held for use in teaching, testing, experiments, research, or surgery but not yet used for such purposes.	C.  Number of animals upon which teaching, research, experiments, or tests were conducted involving no pain, distress, or use of pain-relieving drugs.	D.  Number of animals upon which experiments, teaching, research, surgery, or tests were conducted involving accompanying pain or distress to the animals and for which appropriate anesthetic, analgesic, or tranquilizing drugs were used.	E.  Number of animals upon which teaching, experiments, research, surgery, or tests were conducted involving accompanying pain or distress to the animals and for which the use of appropriate anesthetic, analgesic, or tranquilizing drugs would have adversely affected the procedures, results, or interpretation of the teaching, research, experiments, surgery, or tests. (An explanation of the procedures producing pain or distress on these animals and the reasons such drugs were not used must be attached to this report.)	F.  TOTAL NUMBER OF ANIMALS  (Cols. C + D + E)
4. Dogs	0	0	0	0	0
5. Cats	0	0	0	0	0
6. Guinea Pigs	0	0	0	0	0
7. Hamsters	0	2	65	0	67
8. Rabbits	0	0	0	0	0
9. Non-human Primates	0	0	0	0	0
10. Sheep	0	0	0	0	0
11. Pigs	0	0	0	0	0
12. Other Farm Animals					
13. Other Animals					

**ASSURANCE STATEMENTS**

- Professionally acceptable standards governing the care, treatment, and use of animals, including appropriate use of anesthetic, analgesic, and tranquilizing drugs, prior to, during, and following actual research, teaching, testing, surgery, or experimentation were followed by this research facility.
- Each principal investigator has considered alternatives to painful procedures.
- This facility is adhering to the standards and regulations under the Act, and it has required that exceptions to the standards and regulations be specified and explained by the principal investigator and approved by the Institutional Animal Care and Use Committee (IACUC). **A summary of all such exceptions is attached to this annual report.** In addition to identifying the IACUC approved exceptions, this summary includes a brief explanation of the exceptions, as well as the species and number of animals affected.
- The attending veterinarian for this research facility has appropriate authority to ensure the provisions of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use.

<b>CERTIFICATION BY HEADQUARTERS RESEARCH FACILITY OFFICIAL</b> <b>(Chief Executive Officer (C.E.O.) or Legally Responsible Institutional Official (L.O.))</b> I certify that the above is true, correct, and complete (7 U.S.C. Section 2143).	
<div style="background-color: black; height: 40px;"></div>	<b>DATE SIGNED</b> 01-FEB-2018

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.		<b>OMB APPROVED</b> 0579-0036 Exp.: 10/31/2018
This report is required by law (7 U.S.C. 2143). Failure to report according to the regulations can result in an order to cease and desist and to be subject to penalties as provided for in Section 2150.		Interagency Report Control No. 0180-DOA-AN
		Fiscal Year 2016

<b>UNITED STATES DEPARTMENT OF AGRICULTURE</b> <b>ANIMAL AND PLANT HEALTH INSPECTION SERVICE</b>  <b>ANNUAL REPORT OF RESEARCH FACILITY</b> (TYPE OR PRINT)	<b>1. REGISTRATION NUMBER</b> 57-R-0124
	<b>2. HEADQUARTERS RESEARCH FACILITY</b> (Name, address, and telephone number as registered with USDA, include ZIP Code)  MOREHOUSE SCHOOL OF MEDICINE 720 WESTVIEW DRIVE SW  ATLANTA, GA 30310
<b>3. REPORTING FACILITY</b> (List all locations where animals were housed or used in actual research, testing, teaching, or experimentation, or held for these purposes. Attach additional sheets, if necessary.)	

<b>FACILITY LOCATIONS (Sites)</b>
[Redacted Area]

REPORT OF ANIMALS USED BY OR UNDER CONTROL OF RESEARCH FACILITY (Attach additional sheets, if necessary, or use APHIS FORM 7023A.)					
A.  Animals Covered By The Animal Welfare Regulations	B.  Number of animals being bred, conditioned, or held for use in teaching, testing, experiments, research, or surgery but not yet used for such purposes.	C.  Number of animals upon which teaching, research, experiments, or tests were conducted involving no pain, distress, or use of pain-relieving drugs.	D.  Number of animals upon which experiments, teaching, research, surgery, or tests were conducted involving accompanying pain or distress to the animals and for which appropriate anesthetic, analgesic, or tranquilizing drugs were used.	E.  Number of animals upon which teaching, experiments, research, surgery, or tests were conducted involving accompanying pain or distress to the animals and for which the use of appropriate anesthetic, analgesic, or tranquilizing drugs would have adversely affected the procedures, results, or interpretation of the teaching, research, experiments, surgery, or tests. (An explanation of the procedures producing pain or distress on these animals and the reasons such drugs were not used must be attached to this report.)	F.  TOTAL NUMBER OF ANIMALS  (Cols. C + D + E)
4. Dogs	0	0	0	0	0
5. Cats	0	0	0	0	0
6. Guinea Pigs	0	0	0	0	0
7. Hamsters	0	0	45	0	45
8. Rabbits	0	0	0	0	0
9. Non-human Primates	0	0	0	0	0
10. Sheep	0	0	0	0	0
11. Pigs	0	0	0	0	0
12. Other Farm Animals					
13. Other Animals					

<b>ASSURANCE STATEMENTS</b>	
1.) Professionally acceptable standards governing the care, treatment, and use of animals, including appropriate use of anesthetic, analgesic, and tranquilizing drugs, prior to, during, and following actual research, teaching, testing, surgery, or experimentation were followed by this research facility.	
2.) Each principal investigator has considered alternatives to painful procedures.	
3.) This facility is adhering to the standards and regulations under the Act, and it has required that exceptions to the standards and regulations be specified and explained by the principal investigator and approved by the Institutional Animal Care and Use Committee (IACUC). A summary of all such exceptions is attached to this annual report. In addition to identifying the IACUC approved exceptions, this summary includes a brief explanation of the exceptions, as well as the species and number of animals affected.	
4.) The attending veterinarian for this research facility has appropriate authority to ensure the provisions of adequate veterinary care and to oversee the adequacy of other aspects of animal care and use.	

<b>CERTIFICATION BY HEADQUARTERS RESEARCH FACILITY OFFICIAL</b> <b>(Chief Executive Officer (C.E.O.) or Legally Responsible Institutional Official (L.O.))</b> I certify that the above is true, correct, and complete (7 U.S.C. Section 2143).	
[Redacted Signature]	<b>DATE SIGNED</b> 01-NOV-2016